

Issue & Index to Rule Provisions	Comments	Clarification	Possible Revisions to Proposed Rules or Other Actions	Proposed Remedy
<p>1. Agreed schedule of reductions. Criteria for setting mercury reduction levels. Why do we need phased reductions?</p> <p>s. NR 446.06 (1) – (3)</p>	<p>June 5, 2001 Bazzell memo to NRB (Keith Reopelle)</p>	<p>There appears to be some uncertainty associated with the ability of USEPA to develop an electric utility MACT before the MACT hammer provision occurs. Thus, there is value in a state rule that provides a clear and consistent mercury reduction requirement for electric utilities in the state.(DNR Staff)</p> <p>This information is placed in the EA. The TAG has done a substantial evaluation that will assist the WDNR in preparing a more complete EA with the final rule. (DNR Staff)</p> <p>It is important to distinguish between new and existing sources when applying control technology. For existing sources the ability to retrofit and redesign may be limited.(DNR Staff)</p>	<p>- Revise to WUA proposal of 10% reduction in 5 years and 40% reduction in 10 years.</p> <p>- Add a provision that will allow for alignment with Federal MACT and multi-pollutant regulations.</p> <p>- Conduct review of variables affecting time to implement rule (i.e., outage schedules, PSC approvals, joint ownership consideration, design and equipment availability, etc...)(Joe Shefchek)</p> <p>Develop technical and economic basis for establishing controls and reduction levels to include electric rate impacts and environmental benefits analysis. Reduction requirements need to be consistent with Federal requirements. (Annabeth Reitter)</p> <p>Instead of revising the rule to a more relaxed reduction level, write it for the best (cleanest) that new technology can implement. Committing to the highest standard earliest is also the most cost-effective for utilities to implement. Rather than conduct a review of variables, eliminate redundancy such as PSC involvement; (i.e., PSC having prejudiced themselves by defining their opinion before public hearings were concluded.) (Mark Yeager)</p> <p>Wisconsin Electric supports alternative two of the proposed rule package. We propose a mandatory program which would require 10% and 40% reductions from utility sources over five and ten years, respectively. Other components of this alternative are linked to priority items 2, 3, 5 and 7. Necessary features of this reduction schedule include multi-emission alternative, advanced technology option and elimination of offset requirement (replaced with case-by-case mercury</p>	<ul style="list-style-type: none">• Eliminate first phase mercury reduction requirement. Establish a final mercury reduction goal or virtual elimination commitment.(Staff Conceptual Proposal)• Establish a requirement similar to the Clear Skies proposal to achieve a 50% reduction by 2010 and a 70% reduction by 2018. (Staff Conceptual Proposal)• Provide a multi-pollutant reduction compliance alternative that would extend the compliance date to 2012. Reduction required by 2018 still stands. (Staff Conceptual Proposal)

			controls for new sources). Several underlying implementation issues to resolve including baselines, compliance demonstration, control performance contingencies, trading and averaging provisions, early reduction crediting and transition to pending federal standards. (Kathleen Standen)	
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